

DISTRICT COURT OF MARYLAND FOR

LOCATED AT (COURT ADDRESS)



CASE NO.

CV

PARTIES

Plaintiff

PATRICIA A. KING
5900 FOREST ROAD
CHIEVERLY, MD 20785-
2946

VS.

Defendant(s):

1. SALLIE MAE, INC.
(RA) The Corporation Trust,
Incorporated
300 E. Lombard St
Baltimore, MD
21202

Serve by:
☒ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

Serve by:
☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

3.

Serve by:
☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

4.

Serve by:
☐ Certified
Mail
☐ Private
Process
☐ Constable
☐ Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

PATRICIA A. KING
5900 FOREST ROAD
CHIEVERLY, MD 20785-2946
301 341-1029

COMPLAINT ☐ \$5,000 or under ☐ over \$5,000 ☒ over \$10,000Clerk: Please docket this case in an action of ☐ contract ☒ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

Sallie Mae, Inc. and its agents, in
violation of the Fair Debt Collection
Practices Act (15 U.S.C. 1692; 16 Stat. 2007)
§ 804(3) have repeatedly called a
(my father's)
third party to get my address and
phone when Sallie Mae was also
calling me at my home number.
In August 2007, Sallie Mae was asked
to stop. They did not. They continued
to call my father until June 2008.
This is a clear, repeated, and

(See Continuation Sheet)

☐ Legal
☐ Contractual _____ %

The Plaintiff claims:

- ☐ \$ _____ plus interest of \$ _____ and
attorney's fees of \$ _____ plus court costs.
☐ Return of the property and damages of \$ _____
for its detention in an action of replevin.
☐ Return of the property, or its value, plus damages of
\$ _____ for its detention in action of detinue.
☒ Other: "25000 plus court costs
and demands judgment for relief."

Patricia A. King
Signature of Plaintiff/Attorney/Attorney Code

Telephone Number: 301 341 1029

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the Defendant clearly of the claim against the Defendant, including the amount of any interest claimed.

- ☐ Property authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest work
☐ Vouchers ☐ Check ☐ Other written document ☐ _____ ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☒ Plaintiff ☐ _____ of the Plaintiff herein and am competent to testify to the matters stated in this complaint, which are made on my personal knowledge; that there is justly due and owing by the Defendant to the Plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters. ☐ The Defendant(s) ☐ is/are in the military service ☒ is/are not in the military service and the facts supporting this statement are: Sallie Mae, Inc. is a corporate entity doing

business in Maryland

- ☐ I am unable to determine whether or not any Defendant is in military service.

Date: 10/8/08

Patricia A. King
Signature of Affiant

CONTINUATION SHEET

KING vs. Sallie Mae, Inc

intentional violation of FDCPA § 804(3). These repeated, unnecessary calls to a third party resulted in my embarrassment, humiliation, and distress.

Therefore, I am claiming damages in the amount of \$1000 (as permitted under § 813) for each of the violations, beginning October 8, 2007 and ending June 26, 2008, in the amount of \$25,000.

The frequency, persistence and intentionality of Sallie Mae's continuing violations justify the maximum penalty.

Patricia R. King